

EXHIBIT 3

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

IN RE: NEW ENGLAND)
COMPOUNDING PHARMACY, INC.) MDL No. 2419
PRODUCTS LIABILITY LITIGATION) Dkt. No. 1:13-md-2419-RWZ
_____)
)

This Document Relates to:)
)

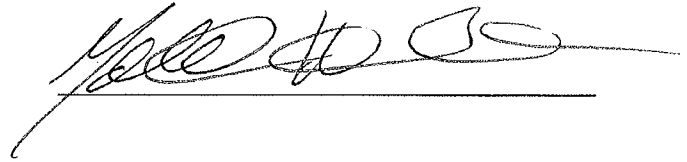
Suits Naming Specialty Surgery Center,)
PLLC)
_____)

Supplemental Affidavit of Matthew H. Cline


STATE OF TENNESSEE
COUNTY OF DAVIDSON

Matthew H. Cline, after first being duly sworn, states as follows:

1. I am over 18 years of age, have personal knowledge of the facts contained herein, and I am competent to testify.
2. I am one of the attorneys representing Specialty Surgery Center, PLLC ("SSC"), Kenneth Lister, MD, Kenneth Lister, MD, PC, and Jean Atkinson, RN in the NECC MDL.
3. Our firm was retained to represent SSC in October 2012.
4. Attorneys with our firm exchanged confidential attorney-client communications with SSC employees via email prior to the sale of SSC's assets in June 2013.
5. I have searched my email account for emails to and from SSC email accounts.
6. My searches located more than 400 emails.
7. A number of these emails and their attachments were prepared in anticipation of litigation, contain the mental impressions and theories of counsel, or contain legal advice conveyed to SSC by our office.
8. The SSC staff members our firm communicated with most frequently using SSC email accounts were Jean Atkinson, RN and Kim Bowlin.



Sworn to and subscribed by me on this 21st day of June, 2016.


(Notary Public)

My Commission Expires: 07/03/17

